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Attorneys for Defendant  
CITIGROUP GLOBAL MARKETS, INC., D/B/A SMITH  
BARNEY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RENEE FASSBENDER AMOCHAEV, et  
al.,

Plaintiff,

vs.

CITIGROUP GLOBAL MARKETS, INC.,  
d/b/a SMITH BARNEY,

Defendant.

CASE NO. C 05-1298 PJH

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND PLAINTIFFS' TIME  
TO RESPOND TO DEFENDANT'S  
MOTION TO TRANSFER AND  
CONSOLIDATE HEARING ON MOTION  
WITH CASE MANAGEMENT  
CONFERENCE**

Current Hearing Date: July 20, 2005 (9:00 am)  
Proposed Date: Sept. 14, 2005 (9:00 am)

**The Honorable Phyllis Jean Hamilton**

1 WHEREAS, Defendant filed a Motion to Transfer Pursuant to 28 U.S.C. § 1404(a)  
2 on June 10, 2005 (the "Transfer Motion"); and

3 WHEREAS, Defendant noticed a hearing on the Transfer Motion for July 20,  
4 2005; and

5 WHEREAS, at the request of the Plaintiffs, the parties have agreed to an extension  
6 of the dates for the filing of opposition and reply papers to the Transfer Motion, and they have  
7 agreed to an associated continuance of the originally noticed hearing date; and

8 WHEREAS, the parties previously requested and this Court granted a continuance  
9 of the Case Management Conference to September 15, 2005; and

10 WHEREAS, counsel for both parties may be traveling from out of state to attend  
11 the hearing on the transfer motion and the previously-scheduled Case Management Conference,  
12 and therefore respectfully request that in the interest of judicial efficiency and preservation of  
13 resources, the Court hold the Case Management Conference on September 14, 2005 together with  
14 the hearing on the Transfer Motion; and

15 WHEREAS, the parties through their counsel of record stipulate to an order as  
16 follows:

17 ///

18 ///

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1 Plaintiffs' Opposition to Defendant's Motion to Transfer shall be due on July 29,  
2 2005; Defendant's Reply shall be due on September 2, 2005; and both the hearing on the Transfer  
3 Motion and the Case Management Conference shall be held on Wednesday, September 14, 2005,  
4 at 9:00 a.m. Other than as set forth in this Order, the Local Rules of Court and other pertinent  
5 rules shall govern the pleadings filed in connection with the Motion to Transfer.

6  
7 DATED: June 29, 2005

LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP

8  
9  
10 By: 

KELLY M. DERMODY

11 Attorneys for Plaintiffs  
12 RENEE FASSBENDER AMOCHAEV,  
13 DEBORAH ORLANDO, KATHRYN N.  
14 VARNER AND JUDY WEIL

15  
16 DATED: June \_\_\_\_\_, 2005

MUNGER, TOLLES & OLSON LLP


17  
18 By: \_\_\_\_\_

MALCOLM A. HEINICKE

19 Attorneys for Defendant  
20 CITIGROUP GLOBAL MARKETS, INC.,  
21 D/B/A SMITH BARNEY

22 PURSUANT TO STIPULATION, IT IS SO ORDERED

23 Dated: 7/1/05

24   
25 HONORABLE PHYLLIS JEAN HAMILTON  
26 UNITED STATES DISTRICT JUDGE  
27  
28

1 Plaintiffs' Opposition to Defendant's Motion to Transfer shall be due on July 29,  
2 2005; Defendant's Reply shall be due on September 2, 2005; and both the hearing on the Transfer  
3 Motion and the Case Management Conference shall be held on Wednesday, September 14, 2005,  
4 at 9:00 a.m. Other than as set forth in this Order, the Local Rules of Court and other pertinent  
5 rules shall govern the pleadings filed in connection with the Motion to Transfer.

6  
7 DATED: June \_\_\_\_\_, 2005

LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP

8  
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10 By: \_\_\_\_\_  
KELLY M. DERMODY

11 Attorneys for Plaintiffs  
12 RENEE FASSBENDER AMOCHAEV,  
13 DEBORAH ORLANDO, KATHRYN N.  
VARNER AND JUDY WEIL

14 DATED: June 30, 2005

MUNGER, TOLLES & OLSON LLP

15  
16 By:   
17 MALCOLM A. HEINICKE

18 Attorneys for Defendant  
19 CITIGROUP GLOBAL MARKETS, INC.,  
D/B/A SMITH BARNEY

20  
21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: \_\_\_\_\_

23 HONORABLE PHYLLIS JEAN HAMILTON  
24 UNITED STATES DISTRICT JUDGE